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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

WELLS FARGO BANK, N.A. AS  
TRUSTEE, ON BEHALF OF THE  
HOLDERS OF THE HARBORVIEW  
MORTGAGE LOAN TRUST MORTGAGE  
LOAN PASS-THROUGH CERTIFICATES,  
SERIES 2006-12,

Plaintiff,

vs.

FIDELITY NATIONAL TITLE GROUP,  
INC., et al.,

Defendants.

Case No.: 2:21-cv-02231-APG-EJY

**STIPULATION AND ~~PROPOSED~~  
ORDER EXTENDING DEFENDANT  
FIDELITY NATIONAL TITLE  
INSURANCE COMPANY'S TIME TO  
RESPOND TO MOTION FOR  
REMAND [ECF No. 13]**

**(First Request)**

1 Defendant Fidelity National Title Insurance Company (“Fidelity”) and Plaintiff Wells  
2 Fargo Bank, N.A. (“Wells Fargo”) (collectively, the “Parties”), by and through their counsel of  
3 record, hereby stipulate and agree as follows:

- 4 1. On December 21, 2021, Wells Fargo filed its Complaint in the Second Judicial District  
5 Court, Case No. A-21-834244-C [ECF No. 1-1];
- 6 2. On December 22, 2021, Fidelity filed a Petition for Removal to this Court [ECF No.  
7 1];
- 8 3. On January 21, 2022, Wells Fargo filed a Motion for Remand [ECF No. 13];
- 9 4. Fidelity’s deadline to respond to Wells Fargo’s Motion for Remand is February 4,  
10 2022;
- 11 5. Fidelity’s counsel is requesting an extension until February 11, 2022 to file its  
12 response to the pending Motion for Remand;
- 13 6. Fidelity requests a brief extension of time to respond to the Motion for Remand to  
14 afford Fidelity additional time to respond to the legal arguments set forth in Wells  
15 Fargo’s motion;
- 16 7. Wells Fargo does not oppose the requested extension;
- 17 8. This is the first request for an extension which is made in good faith and not for  
18 purposes of delay;

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1           **IT IS SO STIPULATED** that Fidelity's deadline to respond to Wells Fargo's Motion for  
2 Remand [ECF No. 13] is hereby extended through and including February 11, 2022.

3  
4 Dated: February 3, 2022

EARLY SULLIVAN WRIGHT  
GIZER & McRAE LLP

5  
6 By: /s/-- Sophia S. Lau  
SCOTT E. GIZER  
SOPHIA S. LAU  
7 Attorneys for Defendant FIDELITY  
8 NATIONAL TITLE INSURANCE  
COMPANY

9  
10 Dated: February 3, 2022

SINCLAIR BRAUN LLP

11 By: /s/-Kevin S. Sinclair  
KEVIN S. SINCLAIR  
12 Attorneys for Defendant FIDELITY  
13 NATIONAL TITLE INSURANCE  
COMPANY

14 Dated: February 3, 2022

WRIGHT FINLAY & ZAK, LLP

15 By: /s/-Lindsay D. Dragon  
LINDSAY D. DRAGON  
16 Attorneys for Plaintiff WELLS FARGO  
17 BANK, N.A.

18 **IT IS SO ORDERED:**

19  
20 Dated: February 4, 2022

21 By: Clayton J. Zouchak  
UNITED STATES MAGISTRATE JUDGE